

**REMARKS**

Claims 1-19 are pending in the application.

Claims 1-19 were rejected.

Claims 1, 11, 16 and 19 are amended herewith.

**I. 35 U.S.C. §102 Claim Rejections**

In the Office Action, claims 1, 8-10 and 16 were rejected under 35 USC §102(e) as being anticipated by Moy *et al.* (U.S. Published Patent Application No. 2003/0035411A1). For the reasons set forth below, and in light of the claim amendments made herein, Applicants respectfully traverse the §102 rejection of their claims and request reconsideration by the Examiner.

The invention disclosed and claimed in this application is directed to an enhanced signaling system that operates to provide a signaling platform that is independent of the electronic and optical switching and transmission systems interconnected with an integrated optical network. In particular, the enhanced signaling system of the invention provides a signaling mechanism that allows any interface device to the optical network to be handled without the need to use the legacy signaling techniques of that device. A key feature of the invention is that of the signaling method and apparatus of the invention operating to process signaling information from various external signaling networks, including networks operating with electronic signaling, into optical signaling for direct interface with optical components of the transmission network. Thus the signaling can be accomplished by way of optical interfaces that couple directly to the respective optical components rather than having signaling being accomplished through electrical connections as occurs in the prior art. This feature of the invention is described at page 6, line 1 through page 7, line 6, and particularly at page 6, lines

1-5 and page 6, lines 16-18. As will be seen, each of the independent claims has been amended to more precisely address this feature of the invention.

The cited reference, Moy, simply does not provide a teaching that can reasonably be construed to show or suggest a ubiquitous signaling system that operates to interface multiple legacy external signaling systems to an integrated optical network independently of the signaling techniques/protocols of those multiple external signaling systems. Indeed, the only signaling addressed by Moy is that between an end user device and an input node to the optical network of Moy, signaling which in most cases will certainly be electrical in character, with no suggestion of conversion to optical form for interfacing with the optical network. Simply put, nothing in the teaching of Moy shows or suggests a ubiquitous signaling mechanism that operates independently of the external signaling networks to which it is interfaced to provide signaling in optical form to the optical components of the network -- the essential idea of the invention here.

In view of the claim amendments presented herein, it is believed that the claimed invention is clearly distinguished over the teaching of Moy. Withdrawal of the §102 rejection of claims 1, 8-10 and 16 is accordingly respectfully requested.

## **II. 35 U.S.C. §103 Claim Rejections**

Claims 2-7, 11-15 and 17-19 were rejected under 35 U.S.C. §103 as being unpatentable over a combination of Moy *et al.* and at least one of three cited secondary references. In respect to claims 2-7, 11-15 and 17-18, it is noted that each of those rejected claims depends, either directly or indirectly, from one of independent claims 1, 11 or 16. Applicant has shown above that each of those independent claims is novel over the cited primary reference.

Accordingly, those dependent claims must also be patentable over the cited reference.

Withdrawal of the §103 rejection of dependent claims 2-7, 11-15 and 17-18 is accordingly respectfully requested.

Independent claim 19 was rejected over a combination of Moy *et al.* and Milton *et al.* (US Patent No.6,084,694). As with independent claims 1, 11 and 16, claim 19 has been amended to include a limitation clearly distinguishing over the teaching of Moy. Nothing in the secondary reference could reasonably be construed to teach the new limitation of claim 19, and the claim is accordingly believed to now be patentable over the cited references. Withdrawal of the §103 rejection of claim 19 is accordingly respectfully requested.

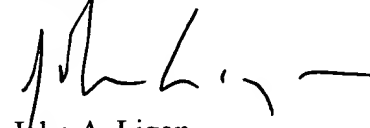
### **III. Conclusion**

Having fully addressed the rejection bases made in the Final Office Action, it is believed that, in view of the preceding amendments and remarks, this application now stands in condition for allowance. Such allowance is respectfully requested.

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Please charge any fees due in respect to this amendment to Deposit Account No. 50-1944.

Respectfully submitted,



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Dated: October 28, 2005

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I hereby certify that this Response to Final Office Action is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313 on October 28, 2005.

By:   
John A. Ligon